

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

JOHN RICHARD ANDERSON

Plaintiff,

v.

CONTINENTAL WESTERN INSURANCE
COMPANY, BERKLEY NATIONAL
INSURANCE COMPANY F/K/A UNION
STANDARD INSURANCE COMPANY,
AND CHRISTOPHER LEE MICHELS,

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 5:17-CV-222

**PLAINTIFF'S MOTION TO DISMISS WITHOUT PREJUDICE
AGAINST DEFENDANT BERKLEY NATIONAL INSURANCE
COMPANY F/K/A UNION STANDARD INSURANCE COMPANY**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff files this Motion to Dismiss without Prejudice. Plaintiff John Richard Anderson at this time, no longer wishes to pursue his claims against Defendant Berkley National Insurance Company F/K/A Union Standard Insurance Company. Plaintiff John Richard Anderson requests that the Court dismiss all claims of Berkley National Insurance Company F/K/A Union Standard Insurance Company without prejudice as to their re-filing. A proposed order is attached.

Respectfully submitted,

By: /s/Matthew J. Worrall

Matthew J. Worrall

SBN: 24070883

FBN: 2148714

WORRALL LAW GROUP, PLLC

1770 Saint James Place, Suite 100

Houston, Texas 77056

Telephone (713) 523-5500

Facsimile (713) 583-3411

Email: mworral@worralllaw.com
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, October 3, 2017, a true and correct copy of the foregoing was served on all counsel of record by ECF in accordance with the Federal Rules of Civil Procedure.

/s/ Matthew J. Worrall
Matthew J. Worrall